# EXHIBIT A

### IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

BRANDON BOSTIAN,

NO. 2:23-CV-01975

Plaintiff.

Honorable John F. Murphy

v.

NATIONAL RAILROAD PASSENGER CORPORATION (AMTRAK),

Defendant.

## DECLARATION OF LINDSAY C. HARRISON IN SUPPORT OF DEFENDANT'S MOTION FOR ATTORNEYS' FEES AND COSTS AGAINST PLAINTIFF'S COUNSEL

- I, Lindsay C. Harrison, declare under penalty of perjury the following is true and correct, and in support of Defendant National Railroad Passenger Corporation's ("Amtrak") Motion for Attorneys' Fees and Costs Against Plaintiff's Counsel.
  - 1. I am a partner at the law firm Jenner & Block LLP and am the lead counsel representing Defendant Amtrak in the above-captioned matter.
  - I am familiar with the billing rates and recordkeeping practices of Jenner & Block LLP.
  - 3. My qualifications are as follows:
    - a. I graduated from Harvard Law School, cum laude, in 2003.
    - b. I joined Jenner & Block LLP in 2007, following two federal judicial clerkships.
    - c. I am a member in good standing of the California and District of Columbia bars, as well as the bars of numerous federal courts.

- 4. My usual billing rate for 2023 was \$1,650.00 per hour, but I billed Amtrak in this matter at a rate of \$1,190.00 per hour. I billed 62.7 hours on this matter. This totaled \$74,613.00.
- 5. Huiyi Chen is an associate at Jenner & Block LLP. Her qualifications are as follows:
  - a. Ms. Chen graduated from the University of Chicago Law School, with honors, in 2017.
  - b. Ms. Chen joined Jenner & Block LLP in 2017.
  - c. Ms. Chen is a member in good standing of the Illinois bar, as well as the bar of the U.S. District Court for the Northern District of Illinois.
- 6. Ms. Chen's usual billing rate for 2023 was \$1,075.00 per hour, but she billed Amtrak in this matter at a rate of \$748.00 per hour. She billed 299.8 hours on this matter. This totaled \$224,250.40.
- 7. Joshua Armstrong is an associate at Jenner & Block LLP. His qualifications are as follows:
  - a. Mr. Armstrong graduated from the University of Chicago Law School, with high honors, in 2021.
  - b. Mr. Armstrong joined Jenner & Block LLP in 2023, following two federal judicial clerkships.
  - c. Mr. Armstrong is a member in good standing of the Texas and District of Columbia bars, as well as the bar of the U.S. District Court for the District of Columbia.

- 8. Mr. Armstrong's usual billing rate for 2023 was \$800.00 per hour, but he billed Amtrak in this matter at a rate of \$539.00 per hour. He billed 43.2 hours on this matter. This totaled \$23,284.80.
- 9. In total, the billed efforts of the three Jenner attorneys who performed significant work on this case took 405.7 hours and cost \$322,148.20.
- 10. The rates billed by all three Jenner attorneys are in line with rates charged by attorneys at large law firms in Philadelphia. *See, e.g., In re Domus BWW Funding, LLC*, 653 B.R. 745, 757-758 n.4 (B.R. E.D. Pa. 2023) (finding "that the rates charged in this matter [by large law firm Perkins Coie LLP] are reasonable and reflective of those charged by similar law firms performing similar work in either New York or Philadelphia"); *In re Domus BWW Funding, LLC*, No. 22-11162, ECF No. 310-6, ¶ 7 (B.R. E.D. Pa. filed Mar. 27, 2023) (listing rates of \$1,125.00−1,270.00 per hour for senior partners and \$950.00 per hour for associate with 7−8 years of legal experience); *In re Domus BWW Funding, LLC*, No. 22-11162, ECF No. 421-2 at 3 (B.R. E.D. Pa. filed Aug. 15, 2023) (comparing rates to those of comparably sized firms in Philadelphia).
- 11. A true and accurate copy of Jenner & Block LLP's time entries for this matter is attached as Exhibit 1 to this Declaration. As the time entries demonstrate, the hours billed to Amtrak reflect reasonable adjustments and write-offs.
- 12. In addition, Jenner & Block LLP's records indicate that Amtrak incurred \$101.40 in court costs in this matter. Specifically, that was the cost of the transcript of the December 12, 2023 evidentiary hearing.

- 13. A true and accurate copy of Jenner & Block's cost entries for this matter is attached as Exhibit 2 to this Declaration. As the cost entries demonstrate, the costs billed to Amtrak reflect reasonable adjustments and write-offs, as well as costs not sought in the present motion.
- 14. A true and accurate copy of the invoice for the evidentiary hearing transcript is attached as Exhibit 3 to this Declaration.

Dated: January 11, 2024 Respectfully submitted,

### DEFENDANT NATIONAL RAILROAD PASSENGER CORPORATION

By: /s/Lindsay C. Harrison
One of Defendant's Attorneys

### Lindsay C. Harrison (appearing pro hac vice)

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## EXHIBIT 1

Time Report

<sup>\*</sup> Values are displayed in US Dollars, \$

Date SM/Task Attor	ney Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate Service	Activity	Invoice	Status
06/14/2023 L120 1904 Corresponded with Amtrak re	LINDSAY C. HARRISON Bostian litigation.	01	Partner	1	0.20	330.00	1,650.00	0.20	238.00	1,190.00 80100		9679298	Billed
06/20/2023 L120 2947 Reviewed and analyzed com	HUIYI CHEN plaint and attachments in the Bostian matter.	02	Associate	1	1.50	1,612.50	1,075.00	1.50	1,122.00	748.00 80100		9679298	Billed
06/21/2023 L120 1904 Participated in call with Amtra	LINDSAY C. HARRISON ak and local counsel re background, answer, and R	01 ule 11 strategy	Partner	1	0.50	825.00	1,650.00	0.50	595.00	1,190.00 80100		9679298	Billed
06/21/2023 L120 2947 Attended kickoff meeting with	HUIYI CHEN Amtrak on the Bostian matter.	02	Associate	1	0.50	537.50	1,075.00	0.50	374.00	748.00 80100		9679298	Billed
06/22/2023 L120 2947 Investigated the forgery of de	HUIYI CHEN mand letter attached to the complaint in the Bostia	02 n matter.	Associate	1	3.10	3,332.50	1,075.00	3.10	2,318.80	748.00 80100		9679298	Billed
06/26/2023 L120 2947 Drafted answer to the Bostian	HUIYI CHEN n complaint.	02	Associate	1	2.00	2,150.00	1,075.00	2.00	1,496.00	748.00 80100		9679298	Billed
06/26/2023 L120 2947 Reviewed and analyzed loca	HUIYI CHEN rules and the Court's rules in preparation for filing	02 an answer.	Associate	1	1.00	1,075.00	1,075.00	1.00	748.00	748.00 80100		9679298	Billed
06/28/2023 L120 2947 Drafted answer and affirmativ	HUIYI CHEN re defenses to Bostian's complaint.	02	Associate	1	4.00	4,300.00	1,075.00	4.00	2,992.00	748.00 80100		9679298	Billed
06/29/2023 L120 2947 Continued to draft and revise	HUIYI CHEN answer and affirmative defenses to Bostian's comp	02 olaint.	Associate	1	3.50	3,762.50	1,075.00	3.50	2,618.00	748.00 80100		9679298	Billed
06/30/2023 L120 2947 Drafted answer and affirmativ	HUIYI CHEN re defenses.	02	Associate	1	3.50	3,762.50	1,075.00	3.50	2,618.00	748.00 80100		9679298	Billed
06/30/2023 L120 1904 Reviewed and revised draft a	LINDSAY C. HARRISON nswer.	01	Partner	1	0.50	825.00	1,650.00	0.50	595.00	1,190.00 80100		9679298	Billed
07/05/2023 L120 2947 Reviewed and analyzed corre	HUIYI CHEN espondence regarding indemnification requests.	02	Associate	1	0.40	430.00	1,075.00	0.40	299.20	748.00 80100		9681346	Billed
07/05/2023 L120 1904 Reviewed and revised draft a	LINDSAY C. HARRISON nswer and affirmative defenses in response to Bos	01 tian complaint	Partner and sent to H. Chen.	1	1.50	2,475.00	1,650.00	1.50	1,785.00	1,190.00 80100		9681346	Billed
07/07/2023 L120 2947 Revised draft answer and aff	HUIYI CHEN rmative defenses.	02	Associate	1	3.20	3,440.00	1,075.00	3.20	2,393.60	748.00 80100		9681346	Billed
07/07/2023 L120 1904 Reviewed revised answer an	LINDSAY C. HARRISON d send final edits to H. Chen.	01	Partner	1	1.00	1,650.00	1,650.00	1.00	1,190.00	1,190.00 80100		9681346	Billed
07/11/2023 L120 2947 Revised draft answer and pro	HUIYI CHEN p hac applications.	02	Associate	1	1.50	1,612.50	1,075.00	1.50	1,122.00	748.00 80100		9681346	Billed
07/12/2023 L120 1904 Reviewed correspondence fr	LINDSAY C. HARRISON om H. Chen re edits to answer and pro hac applica	01 tion.	Partner	1	0.50	825.00	1,650.00	0.50	595.00	1,190.00 80100		9681346	Billed
07/13/2023 L120 2947	HUIYI CHEN	02	Associate	1	0.60	645.00	1,075.00	0.60	448.80	748.00 80100		9681346	Billed

Time Report

Date	SM/Task	Attorne	v Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate Service	Activity II	nvoice	Status
		application						2119							
07/14/2023	L120	2947	HUIYI CHEN native defenses in preparation for filing.	02	Associate	1	1.90	2,042.50	1,075.00	1.90	1,421.20	748.00 80100	9	9681346	Billed
07/17/2023 Worked or		2947 nswer and	HUIYI CHEN disclosure statement.	02	Associate	1	1.00	1,075.00	1,075.00	1.00	748.00	748.00 80100	9	9681346	Billed
07/17/2023 Reviewed		1904 swer in Bo	LINDSAY C. HARRISON stian.	01	Partner	1	0.50	825.00	1,650.00	0.50	595.00	1,190.00 80100	9	9681346	Billed
07/20/2023 Drafted liti		2947 uments in o	HUIYI CHEN compliance with the Court's scheduling order.	02	Associate	1	1.50	1,612.50	1,075.00	1.50	1,122.00	748.00 80100	9	9681346	Billed
07/21/2023 Prepared		2947 al Rule 26(f	HUIYI CHEN f) meeting.	02	Associate	1	1.70	1,827.50	1,075.00	1.70	1,271.60	748.00 80100	9	9681346	Billed
07/22/2023 Drafted Ru		2947 to opposir	HUIYI CHEN ng counsel based on legal research and fact inv	02 estigation.	Associate	1	4.80	5,160.00	1,075.00	4.80	3,590.40	748.00 80100	9	9681346	Billed
07/23/2023 Drafted ini		2947 ures and jo	HUIYI CHEN int Rule 26(f) report.	02	Associate	1	4.80	5,160.00	1,075.00	4.80	3,590.40	748.00 80100	9	9681346	Billed
07/24/2023 Revised d		2947 ıle 26(f) rep	HUIYI CHEN port.	02	Associate	1	4.50	4,837.50	1,075.00	4.50	3,366.00	748.00 80100	9	9681346	Billed
07/24/2023 Revised R		2947 er.	HUIYI CHEN	02	Associate	1	1.00	1,075.00	1,075.00	1.00	748.00	748.00 80100	9	9681346	Billed
07/24/2023 Prepared		2947 ule 26(f) co	HUIYI CHEN nference.	02	Associate	1	1.00	1,075.00	1,075.00	1.00	748.00	748.00 80100	9	9681346	Billed
07/24/2023 Revised d		1904 Goggin re	LINDSAY C. HARRISON indemnification demand and corresponded with	01 n H. Chen re sa	Partner me.	1	0.40	660.00	1,650.00	0.40	476.00	1,190.00 80100	9	9681346	Billed
07/24/2023 Reviewed		1898 Jule 11 issu	JESSICA RING AMUNSON ie.	01	Partner	1	0.20	272.00	1,360.00	0.20	205.60	1,028.00 80100	9	9681346	Billed
07/25/2023 Prepared		2947 ended strate	HUIYI CHEN egy meetings with Amtrak in-house team.	02	Associate	1	1.50	1,612.50	1,075.00	1.50	1,122.00	748.00 80100	9	9681346	Billed
07/25/2023 Prepared		2947 Inded initia	HUIYI CHEN I Rule 26(f) meeting with opposing counsel.	02	Associate	1	0.70	752.50	1,075.00	0.70	523.60	748.00 80100	9	9681346	Billed
07/25/2023 Revised d		2947 isclosures	HUIYI CHEN and Rule 26(f) report based on meet-and-confe	02 with opposing	Associate counsel.	1	2.00	2,150.00	1,075.00	2.00	1,496.00	748.00 80100	9	9681346	Billed
07/25/2023 Drafted pr		2947 le 502(d) o	HUIYI CHEN rder.	02	Associate	1	1.00	1,075.00	1,075.00	1.00	748.00	748.00 80100	9	9681346	Billed
07/25/2023 Prepared		1904 ticipated in	LINDSAY C. HARRISON initial Rule 26(f) conference with Bostian's cour	01 isel.	Partner	1	0.70	1,155.00	1,650.00	0.70	833.00	1,190.00 80100	9	9681346	Billed
07/25/2023	L120	1904	LINDSAY C. HARRISON	01	Partner	1	1.00	1,650.00	1,650.00	1.00	1,190.00	1,190.00 80100	9	9681346	Billed

Time Report

Date SM/Ta	ask Attorney	, Namo	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Roy Hrs	Rev Amt	Rev Rate Service	Activity	Invoice	Status
	<b>,</b>	Acheson and with T. Bloom and co-counsel.	Otan 2010i	Doddiption	rtuto	Olig III O	Olig / line	Originate	1107 1110	110 V / IIII	THE THE CONTROL	riouvity		Ottatas
07/26/2023 L120 Drafted first set of	2947	HUIYI CHEN	02	Associate	1	1.00	1,075.00	1,075.00	1.00	748.00	748.00 80100		9681346	Billed
07/27/2023 L120 Revised draft initia	2947 al disclosures a	HUIYI CHEN and draft Rule 26(f) report.	02	Associate	1	2.00	2,150.00	1,075.00	2.00	1,496.00	748.00 80100		9681346	Billed
07/27/2023 L120 Reviewed and ana	2947 alyzed plaintiff	HUIYI CHEN s draft Rule 26(f) report.	02	Associate	1	0.90	967.50	1,075.00	0.90	673.20	748.00 80100		9681346	Billed
07/27/2023 L120 Reviewed and revi	1904 ised initial disc	LINDSAY C. HARRISON closures and 26f report.	01	Partner	1	0.70	1,155.00	1,650.00	0.70	833.00	1,190.00 80100		9681346	Billed
07/28/2023 L120 Reviewed and ana	2947 alyzed plaintiff	HUIYI CHEN s proposed draft Rule 26(f) report.	02	Associate	1	2.60	2,795.00	1,075.00	2.60	1,944.80	748.00 80100		9681346	Billed
07/28/2023 L120 Drafted first set of	2947 RFPs.	HUIYI CHEN	02	Associate	1	1.00	1,075.00	1,075.00	1.00	748.00	748.00 80100		9681346	Billed
07/30/2023 L120 Drafted chronology	2947 y of key events	HUIYI CHEN s and evidence.	02	Associate	1	1.90	2,042.50	1,075.00	1.90	1,421.20	748.00 80100		9681346	Billed
07/30/2023 L120 Drafted first set of	2947 RFPs.	HUIYI CHEN	02	Associate	1	3.00	3,225.00	1,075.00	3.00	2,244.00	748.00 80100		9681346	Billed
07/30/2023 L120 Drafted first set of	2947 interrogatories	HUIYI CHEN s.	02	Associate	1	3.00	3,225.00	1,075.00	3.00	2,244.00	748.00 80100		9681346	Billed
07/31/2023 L120 Revised draft first	2947 set of written o	HUIYI CHEN discovery.	02	Associate	1	1.20	1,290.00	1,075.00	1.20	897.60	748.00 80100		9681346	Billed
07/31/2023 L120 Revised joint Rule	2947 26(f) report.	HUIYI CHEN	02	Associate	1	2.00	2,150.00	1,075.00	2.00	1,496.00	748.00 80100		9681346	Billed
07/31/2023 L120 Revised initial disc	1904 closure and rev	LINDSAY C. HARRISON viewed stipulations from Bostian.	01	Partner	1	0.70	1,155.00	1,650.00	0.70	833.00	1,190.00 80100		9681346	Billed
08/01/2023 L120 Revised Joint Rule	2947 e 26(f) report v	HUIYI CHEN vith opposing counsel.	02	Associate	1	2.00	2,150.00	1,075.00	2.00	1,496.00	748.00 80100		9683400	Billed
08/01/2023 L120 Revised first set of	2947 f written discov	HUIYI CHEN very.	02	Associate	1	2.00	2,150.00	1,075.00	2.00	1,496.00	748.00 80100		9683400	Billed
08/01/2023 L120 Reviewed and revi	1904 ised draft docu	LINDSAY C. HARRISON ument requests to Bostian and sent edits to H. C	01 hen to implem	Partner ent.	1	0.50	825.00	1,650.00	0.50	595.00	1,190.00 80100		9683400	Billed
08/02/2023 L120 Finalized joint Rule	2947 e 26(f) report a	HUIYI CHEN and initial disclosures.	02	Associate	1	2.00	2,150.00	1,075.00	2.00	1,496.00	748.00 80100		9683400	Billed
08/02/2023 L120 Conferred with H.	1904 Chen on strate	LINDSAY C. HARRISON egy with Goggin.	01	Partner	1	0.30	495.00	1,650.00	0.30	357.00	1,190.00 80100		9683400	Billed
08/03/2023 L120	2947	HUIYI CHEN	02	Associate	1	0.10	107.50	1,075.00	0.10	74.80	748.00 80100		9683400	Billed

Time Report

Date	SM/Tas	k Attorney	/ Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate Service	Activity	Invoice	Status
Communic	cated with	opposing co	ounsel regarding plan for filing.												
08/04/2023 Revised a		2947 d first set of	HUIYI CHEN written discovery.	02	Associate	1	1.40	1,505.00	1,075.00	1.40	1,047.20	748.00 80100		9683400	Billed
08/04/2023 Reviewed		1904 ed discovery	LINDSAY C. HARRISON requests.	01	Partner	1	0.30	495.00	1,650.00	0.30	357.00	1,190.00 80100		9683400	Billed
08/09/2023 Discussed		2947 egarding su	HUIYI CHEN bpoenas.	02	Associate	1	0.90	967.50	1,075.00	0.90	673.20	748.00 80100		9683400	Billed
08/11/2023 Discussed		2947 s related to p	HUIYI CHEN potential subpoenas to criminal defense attorney	02 s.	Associate	1	0.80	860.00	1,075.00	0.80	598.40	748.00 80100		9683400	Billed
08/11/2023 Correspon		1904 H. Chen and	LINDSAY C. HARRISON considered strategy re: attorney subpoenas.	01	Partner	1	0.30	495.00	1,650.00	0.30	357.00	1,190.00 80100		9683400	Billed
08/14/2023 Drafted su		2947 criminal de	HUIYI CHEN fense attorney in Bostian's criminal case.	02	Associate	1	4.40	4,730.00	1,075.00	4.40	3,291.20	748.00 80100		9683400	Billed
08/16/2023 Finalized a		2947 d subpoena	HUIYI CHEN to Bostian's criminal defense attorney.	02	Associate	1	1.80	1,935.00	1,075.00	1.80	1,346.40	748.00 80100		9683400	Billed
08/16/2023 Reviewed		1904 ooena to crin	LINDSAY C. HARRISON ninal counsel and corresponded with H. Chen re	01 same.	Partner	1	0.20	330.00	1,650.00	0.20	238.00	1,190.00 80100		9683400	Billed
08/17/2023 Communic		2947 opposing co	HUIYI CHEN ounsel on draft Rule 26(f) report.	02	Associate	1	0.10	107.50	1,075.00	0.10	74.80	748.00 80100		9683400	Billed
08/18/2023 Prepared f		2947 ended meet	HUIYI CHEN -and-confer with opposing counsel on joint Rule	02 26(f) report an	Associate d discovery plan.	1	1.30	1,397.50	1,075.00	1.30	972.40	748.00 80100		9683400	Billed
08/18/2023 Prepared f		1904 rticipated in	LINDSAY C. HARRISON meeting with plaintiff's counsel re: schedule and	01 discovery.	Partner	1	0.30	495.00	1,650.00	0.30	357.00	1,190.00 80100		9683400	Billed
08/21/2023 Finalized F		2947 report for fili	HUIYI CHEN ng.	02	Associate	1	0.70	752.50	1,075.00	0.70	523.60	748.00 80100		9683400	Billed
08/22/2023 Reviewed		2947 production o	HUIYI CHEN f legal costs documents.	02	Associate	1	0.50	537.50	1,075.00	0.50	374.00	748.00 80100		9683400	Billed
08/23/2023 Reviewed		2947 narized docu	HUIYI CHEN uments collected from Amtrak in preparation for c	02 discovery resp	Associate onses.	1	2.00	2,150.00	1,075.00	2.00	1,496.00	748.00 80100		9683400	Billed
08/23/2023 Reviewed		2947 narized Bost	HUIYI CHEN tian's initial disclosures and productions.	02	Associate	1	4.00	4,300.00	1,075.00	4.00	2,992.00	748.00 80100		9683400	Billed
08/24/2023 Drafted tal		2947 s for the initi	HUIYI CHEN ial Rule 16(f) conference.	02	Associate	1	1.20	1,290.00	1,075.00	1.20	897.60	748.00 80100		9683400	Billed
08/25/2023 Drafted tal		2947 s for the initi	HUIYI CHEN ial Rule 16(f) hearing.	02	Associate	1	3.60	3,870.00	1,075.00	3.60	2,692.80	748.00 80100		9683400	Billed
08/27/2023	L120	2947	HUIYI CHEN	02	Associate	1	2.50	2,687.50	1,075.00	2.50	1,870.00	748.00 80100		9683400	Billed

Time Report

Date	SM/Task	Attorney	Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate Service	Activity	Invoice	Status
		-	tion for Rule 16(f) hearing.												
08/28/2023	L120	2947	HUIYI CHEN ase development.	02	Associate	1	0.70	752.50	1,075.00	0.70	523.60	748.00 80100		9683400	Billed
08/28/2023 Reviewed		1904 mmary of e	LINDSAY C. HARRISON evidentiary submissions by Bostian regarding co	01 sts and fees in	Partner curred in criminal hearing for which in	1 ndemnifi	0.20 cation is being s	330.00 sought.	1,650.00	0.20	238.00	1,190.00 80100		9683400	Billed
08/29/2023 Drafted ca	L120 se memora	2947 ndum.	HUIYI CHEN	02	Associate	1	5.80	6,235.00	1,075.00	5.80	4,338.40	748.00 80100		9683400	Billed
08/30/2023 Continued	L120 to draft cas	2947 e memorar	HUIYI CHEN ndum.	02	Associate	1	7.00	7,525.00	1,075.00	7.00	5,236.00	748.00 80100		9683400	Billed
08/31/2023 Call with 0		1904 ettlement a	LINDSAY C. HARRISON nd related correspondence.	01	Partner	1	0.30	495.00	1,650.00	0.30	357.00	1,190.00 80100		9683400	Billed
08/31/2023 Prepared		2947 nded settler	HUIYI CHEN ment discussion with opposing counsel.	02	Associate	1	0.60	645.00	1,075.00	0.60	448.80	748.00 80100		9683400	Billed
08/31/2023 Revised ca		2947 andum and	HUIYI CHEN talking points in preparation for the initial Rule 1	02 6(f) hearing.	Associate	1	7.50	8,062.50	1,075.00	7.50	5,610.00	748.00 80100		9683400	Billed
09/01/2023 Prepared	L120 for the Rule	2947 16(f) heari	HUIYI CHEN ng.	02	Associate	1	0.30	322.50	1,075.00	0.30	224.40	748.00 80100		9685407	Billed
09/05/2023 Prepared		2947 nded Rule	HUIYI CHEN 16(f) hearing.	02	Associate	1	2.80	3,010.00	1,075.00	2.80	2,094.40	748.00 80100		9685407	Billed
09/05/2023 Drafted cli		2947 egarding F	HUIYI CHEN Rule 16(f) hearing and case strategy.	02	Associate	1	2.00	2,150.00	1,075.00	2.00	1,496.00	748.00 80100		9685407	Billed
09/05/2023 Worked or		2947 ıle 502(d) d	HUIYI CHEN order pursuant to the Court's instruction.	02	Associate	1	1.00	1,075.00	1,075.00	1.00	748.00	748.00 80100		9685407	Billed
09/05/2023 Communic		2947 pposing co	HUIYI CHEN unsel and subpoenaed third party on discovery	02 responses.	Associate	1	1.00	1,075.00	1,075.00	1.00	748.00	748.00 80100		9685407	Billed
09/05/2023 Reviewed		1904 naterials, jo	LINDSAY C. HARRISON int status report, and correspondence from H. C	01 hen in prepara	Partner ation for status conference with Court	1	0.70	1,155.00	1,650.00	0.70	833.00	1,190.00 80100		9685407	Billed
09/05/2023 Participate	L120 ed in status	1904 conference	LINDSAY C. HARRISON	01	Partner	1	0.30	495.00	1,650.00	0.30	357.00	1,190.00 80100		9685407	Billed
09/06/2023 Communic		2947 pposing co	HUIYI CHEN unsel on discovery requests.	02	Associate	1	0.20	215.00	1,075.00	0.20	149.60	748.00 80100		9685407	Billed
09/07/2023 Communic		2947 lient on ma	HUIYI CHEN gistrate judge and subpoena response.	02	Associate	1	0.20	215.00	1,075.00	0.20	149.60	748.00 80100		9685407	Billed
09/08/2023 Attended s		2947 eting with c	HUIYI CHEN lient and local counsel.	02	Associate	1	0.50	537.50	1,075.00	0.50	374.00	748.00 80100		9685407	Billed
09/08/2023	L120	2947	HUIYI CHEN	02	Associate	1	3.20	3,440.00	1,075.00	3.20	2,393.60	748.00 80100		9685407	Billed

Time Report

Date	SM/Tasl	Attorney	Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate Service	Activity	Invoice	Status
Conducted	d legal rese	earch on cas	se law of voluntary dismissal.												
09/08/2023 Reviewed		1904 dence re: st	LINDSAY C. HARRISON rategic decisions in matter and discussed same	01 with T. Bloom.	Partner	1	0.40	660.00	1,650.00	0.40	476.00	1,190.00 80100		9685407	Billed
09/09/2023 Drafted pr		2947 ponse to pl	HUIYI CHEN aintiff regarding mediation offer.	02	Associate	1	0.50	537.50	1,075.00	0.50	374.00	748.00 80100		9685407	Billed
09/12/2023 Communic		2947 opposing co	HUIYI CHEN unsel on mediation offer.	02	Associate	1	0.10	107.50	1,075.00	0.10	74.80	748.00 80100		9685407	Billed
09/13/2023 Reviewed		1904 dence from	LINDSAY C. HARRISON opposing counsel re: voluntary dismissal.	01	Partner	1	0.10	165.00	1,650.00	0.10	119.00	1,190.00 80100		9685407	Billed
09/20/2023 Drafted co		2947 on to oppos	HUIYI CHEN ing counsel on case management.	02	Associate	1	0.40	430.00	1,075.00	0.40	299.20	748.00 80100		9685407	Billed
09/21/2023 Reviewed		2947 zed plaintiff:	HUIYI CHEN s motion to dismiss without prejudice in preparat	02 tion for an oppo	Associate psition.	1	1.50	1,612.50	1,075.00	1.50	1,122.00	748.00 80100		9685407	Billed
09/22/2023 Attended		2947 eeting with o	HUIYI CHEN lient.	02	Associate	1	0.50	537.50	1,075.00	0.50	374.00	748.00 80100		9685407	Billed
09/22/2023 Research		2947 v in support	HUIYI CHEN of opposition to plaintiff's motion to dismiss.	02	Associate	1	6.00	6,450.00	1,075.00	6.00	4,488.00	748.00 80100		9685407	Billed
09/22/2023 Correspor		1904 I. Chen re s	LINDSAY C. HARRISON trategy.	01	Partner	1	0.50	825.00	1,650.00	0.50	595.00	1,190.00 80100		9685407	Billed
09/23/2023 Drafted th		2947 n brief to pla	HUIYI CHEN aintiff's motion to dismiss.	02	Associate	1	5.40	5,805.00	1,075.00	5.40	4,039.20	748.00 80100		9685407	Billed
09/24/2023 Continued		2947 h for and dr	HUIYI CHEN aft opposition to plaintiff's motion to dismiss.	02	Associate	1	6.00	6,450.00	1,075.00	6.00	4,488.00	748.00 80100		9685407	Billed
09/25/2023 Continued		2947 position to I	HUIYI CHEN Plaintiff's motion to dismiss.	02	Associate	1	7.00	7,525.00	1,075.00	7.00	5,236.00	748.00 80100		9685407	Billed
09/26/2023 Continued		2947 position to p	HUIYI CHEN plaintiffs motion to dismiss.	02	Associate	1	5.60	6,020.00	1,075.00	5.60	4,188.80	748.00 80100		9685407	Billed
09/27/2023 Revised o		2947 Plaintiff's r	HUIYI CHEN notion to compel.	02	Associate	1	3.30	3,547.50	1,075.00	3.30	2,468.40	748.00 80100		9685407	Billed
09/27/2023 Reviewed		1904 d draft oppo	LINDSAY C. HARRISON osition to motion to dismiss without prejudice.	01	Partner	1	1.50	2,475.00	1,650.00	1.50	1,785.00	1,190.00 80100		9685407	Billed
09/28/2023 Drafted ar		2947 opposition to	HUIYI CHEN Delaintiff's motion to dismiss and exhibits.	02	Associate	1	8.50	9,137.50	1,075.00	8.50	6,358.00	748.00 80100		9685407	Billed
09/28/2023 Reviewed		1898 opposition	JESSICA RING AMUNSON to motion to dismiss without prejudice and revie	01 wed E. Acheso	Partner on edits re same.	1	0.50	680.00	1,360.00	0.50	514.00	1,028.00 80100		9685407	Billed
09/28/2023	L120	1904	LINDSAY C. HARRISON	01	Partner	1	0.30	495.00	1,650.00	0.30	357.00	1,190.00 80100		9685407	Billed

Time Report

Date	SM/Task	Attorney	Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate Service	Activity In	nvoice	Status
Reviewed	edits from	E. Achesor	and J. Amunson on opposition to motion to disr	niss.											
09/29/2023 Continued		2947 pposition b	HUIYI CHEN rief and ancillary papers.	02	Associate	1	1.90	2,042.50	1,075.00	1.90	1,421.20	748.00 80100	90	685407	Billed
09/29/2023 Reviewed		1904 evised draf	LINDSAY C. HARRISON topposition to motion to dismiss.	01	Partner	1	0.70	1,155.00	1,650.00	0.70	833.00	1,190.00 80100	90	685407	Billed
10/02/2023 Further re		2947 sition brief a	HUIYI CHEN and ancillary papers.	02	Associate	1	1.00	1,075.00	1,075.00	1.00	748.00	748.00 80100	90	687301	Billed
10/02/2023 Research		2947 / for disqua	HUIYI CHEN lifying opposing counsel based on conflict of inte	02 rest.	Associate	1	2.50	2,687.50	1,075.00	2.50	1,870.00	748.00 80100	90	687301	Billed
10/02/2023 Reviewed		1904 isions to dra	LINDSAY C. HARRISON aft response to motion to dismiss and related cor	01 respondence.	Partner	1	1.00	1,650.00	1,650.00	1.00	1,190.00	1,190.00 80100	90	687301	Billed
10/02/2023 Correspor		1904 . Chen, R.	LINDSAY C. HARRISON Stauffer re: ethical considerations for Amtrak reg	01 arding opposit	Partner ion to dismiss.	1	0.20	330.00	1,650.00	0.20	238.00	1,190.00 80100	90	687301	Billed
10/03/2023 Conducted		2947 check of th	HUIYI CHEN e opposition brief.	02	Associate	1	3.20	3,440.00	1,075.00	3.20	2,393.60	748.00 80100	90	687301	Billed
10/03/2023 Reviewed		1904 d oppositio	LINDSAY C. HARRISON n to motion to dismiss and corresponded with H.	01 Chen, T. Bloo	Partner m re same.	1	1.50	2,475.00	1,650.00	1.50	1,785.00	1,190.00 80100	90	687301	Billed
10/04/2023 Prepared		2947 opposition I	HUIYI CHEN orief.	02	Associate	1	2.20	2,365.00	1,075.00	2.20	1,645.60	748.00 80100	90	687301	Billed
10/04/2023 Correspor		1904 . Bloom re:	LINDSAY C. HARRISON Bostian brief and Goggin conflict.	01	Partner	1	0.20	330.00	1,650.00	0.20	238.00	1,190.00 80100	90	687301	Billed
10/05/2023 Prepared		2947 g of oppositi	HUIYI CHEN ion brief and motion for extension.	02	Associate	1	4.20	4,515.00	1,075.00	4.20	3,141.60	748.00 80100	90	687301	Billed
10/05/2023 Calls with		1904 H. Chen an	LINDSAY C. HARRISON d B. Goggin regarding extension of time to respo	01 and to motion to	Partner odismiss and correspondence re	1 same issue	1.20 es.	1,980.00	1,650.00	1.20	1,428.00	1,190.00 80100	9	687301	Billed
10/11/2023 Discussed		2947 or further ex	HUIYI CHEN tending the deadline to file opposition brief.	02	Associate	1	0.20	215.00	1,075.00	0.20	149.60	748.00 80100	9	687301	Billed
10/12/2023 Prepared		2947 motion to e	HUIYI CHEN xtend.	02	Associate	1	0.20	215.00	1,075.00	0.20	149.60	748.00 80100	90	687301	Billed
10/16/2023 Prepared		2947 ond motion	HUIYI CHEN to extend.	02	Associate	1	1.30	1,397.50	1,075.00	1.30	972.40	748.00 80100	9	687301	Billed
10/24/2023 Updated o		2947 rief in prepa	HUIYI CHEN aration for filing.	02	Associate	1	0.60	645.00	1,075.00	0.60	448.80	748.00 80100	90	687301	Billed
10/24/2023 Correspor		1904 mtrak team	LINDSAY C. HARRISON and R. Goggin re: next steps in matter.	01	Partner	1	0.30	495.00	1,650.00	0.30	357.00	1,190.00 80100	90	687301	Billed
10/30/2023	L120	2947	HUIYI CHEN	02	Associate	1	0.30	322.50	1,075.00	0.30	224.40	748.00 80100	9	687301	Billed

Time Report

Date	SM/Task	Attorney	Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate Service	Activity	Invoice	Status
Updated of	opposition br	ief.				-	-						-		
10/30/2023 Discussed	B L120 d status of m	1904 natter with \	LINDSAY C. HARRISON V. Mills.	01	Partner	1	0.50	825.00	1,650.00	0.50	595.00	1,190.00 80100		9687301	Billed
10/30/2023 Called an		1904 R. Goggir	LINDSAY C. HARRISON are: opposition to motion to dismiss without prej	01 udice.	Partner	1	0.50	825.00	1,650.00	0.50	595.00	1,190.00 80100		9687301	Billed
10/30/2023 Updated A		1904 following o	LINDSAY C. HARRISON call with R. Goggin.	01	Partner	1	0.10	165.00	1,650.00	0.10	119.00	1,190.00 80100		9687301	Billed
10/30/2023 Emailed F		1904 aft oppositi	LINDSAY C. HARRISON on to motion to dismiss.	01	Partner	1	0.10	165.00	1,650.00	0.10	119.00	1,190.00 80100		9687301	Billed
10/31/2023 Updated o	3 L120 opposition br	2947 rief and exh	HUIYI CHEN nibits.	02	Associate	1	1.00	1,075.00	1,075.00	1.00	748.00	748.00 80100		9687301	Billed
10/31/2023 Communi	L120 cated with A	1904 .mtrak re R	LINDSAY C. HARRISON . Goggin.	01	Partner	1	0.10	165.00	1,650.00	0.10	119.00	1,190.00 80100		9687301	Billed
11/02/2023 Prepared		2947 he Opposit	HUIYI CHEN ion brief and accompanying exhibits.	02	Associate	1	1.70	1,827.50	1,075.00	1.70	1,271.60	748.00 80100		9689380	Billed
11/07/2023 Reviewed		2947 ed Bostian'	HUIYI CHEN s reply brief in support of motion to dismiss.	02	Associate	1	1.00	1,075.00	1,075.00	1.00	748.00	748.00 80100		9689380	Billed
11/08/2023 Drafted su		2947 position to	HUIYI CHEN plaintiff's motion to dismiss.	02	Associate	1	3.50	3,762.50	1,075.00	3.50	2,618.00	748.00 80100		9689380	Billed
11/08/2023 Strategize		1904 ly in respoi	LINDSAY C. HARRISON nse to brief by R. Goggin admitting to fabricating	01 g evidence.	Partner	1	0.50	825.00	1,650.00	0.50	595.00	1,190.00 80100		9689380	Billed
11/09/2023 Drafted ar		2947 ur-reply and	HUIYI CHEN d ancillary papers.	02	Associate	1	8.00	8,600.00	1,075.00	8.00	5,984.00	748.00 80100		9689380	Billed
11/09/2023 Continued		1904 r-reply brie	LINDSAY C. HARRISON f and declaration in support.	01	Partner	1	1.00	1,650.00	1,650.00	1.00	1,190.00	1,190.00 80100		9689380	Billed
11/10/2023 Revised d	B L120 Iraft sur-repl	2947 y.	HUIYI CHEN	02	Associate	1	1.20	1,290.00	1,075.00	1.20	897.60	748.00 80100		9689380	Billed
11/10/2023 Reviewed		1904 I draft decla	LINDSAY C. HARRISON aration, motion, and memorandum in support of	01 sur-reply.	Partner	1	2.20	3,630.00	1,650.00	2.20	2,618.00	1,190.00 80100		9689380	Billed
11/10/2023 Correspor		1904 Chen re: s	LINDSAY C. HARRISON sur-reply and declaration.	01	Partner	1	0.30	495.00	1,650.00	0.30	357.00	1,190.00 80100		9689380	Billed
11/11/2023 Revised s	B L120 sur-reply and	2947 ancillary p	HUIYI CHEN apers.	02	Associate	1	1.00	1,075.00	1,075.00	1.00	748.00	748.00 80100		9689380	Billed
11/12/2023 Continued	B L120 If to revise ar	2947 nd cite-che	HUIYI CHEN ck sur-reply.	02	Associate	1	1.40	1,505.00	1,075.00	1.40	1,047.20	748.00 80100		9689380	Billed
11/13/2023		2947	HUIYI CHEN	02	Associate	1	2.00	2,150.00	1,075.00	2.00	1,496.00	748.00 80100		9689380	Billed

Time Report

Date	SM/Tasl	Attorney	Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate Service	Activity	Invoice	Status
Finalized	filing of sur-	reply and a	ncillary papers.					-					-		
11/13/2023 Correspor		1904 I. Chen re: f	LINDSAY C. HARRISON inalizing and filing sur-reply.	01	Partner	1	0.20	330.00	1,650.00	0.20	238.00	1,190.00 80100		9689380	Billed
11/14/2023 Worked o		2947 egarding th	HUIYI CHEN e upcoming oral argument and evidentiary heari	02 ng.	Associate	1	0.80	860.00	1,075.00	0.80	598.40	748.00 80100		9689380	Billed
11/14/2023 Reviewed		1904 r scheduling	LINDSAY C. HARRISON g evidentiary hearing and corresponded with Amt	01 rak, H. Chen r	Partner e same.	1	1.00	1,650.00	1,650.00	1.00	1,190.00	1,190.00 80100		9689380	Billed
11/15/2023 Prepared		2947 ument and	HUIYI CHEN evidentiary hearing.	02	Associate	1	0.30	322.50	1,075.00	0.00	0.00	0.00 80100		9689380	Billed
11/15/2023 Reviewed		3406 of events	JOSHUA J.W. ARMSTRONG of case.	02	Associate	1	0.10	80.00	800.00	0.00	0.00	0.00 80100		9689380	Billed
11/15/2023 Reviewed		3406 eply in supp	JOSHUA J.W. ARMSTRONG port of motion to dismiss without prejudice.	02	Associate	1	0.10	80.00	800.00	0.00	0.00	0.00 80100		9689380	Billed
11/15/2023 Reviewed		3406 notion to dis	JOSHUA J.W. ARMSTRONG smiss without prejudice.	02	Associate	1	0.10	80.00	800.00	0.00	0.00	0.00 80100		9689380	Billed
11/15/2023 Reviewed		3406	JOSHUA J.W. ARMSTRONG	02	Associate	1	0.10	80.00	800.00	0.00	0.00	0.00 80100		9689380	Billed
11/15/2023 Reviewed		3406	JOSHUA J.W. ARMSTRONG	02	Associate	1	0.20	160.00	800.00	0.00	0.00	0.00 80100		9689380	Billed
11/15/2023 Reviewed		3406 to plaintiff's	JOSHUA J.W. ARMSTRONG motion to dismiss without prejudice.	02	Associate	1	0.40	320.00	800.00	0.00	0.00	0.00 80100		9689380	Billed
11/15/2023 Reviewed		3406 n opposition	JOSHUA J.W. ARMSTRONG to plaintiff's motion to dismiss without prejudice.	02	Associate	1	0.10	80.00	800.00	0.00	0.00	0.00 80100		9689380	Billed
11/16/2023 Attended		2947 ng on resea	HUIYI CHEN arch assignments in preparation for the evidentia	02 ry hearing.	Associate	1	0.50	537.50	1,075.00	0.50	374.00	748.00 80100		9689380	Billed
11/16/2023 Attended		2947 th client to c	HUIYI CHEN liscuss case strategy.	02	Associate	1	0.30	322.50	1,075.00	0.30	224.40	748.00 80100		9689380	Billed
11/16/2023 Drafted ev		2947 earing plan	HUIYI CHEN	02	Associate	1	4.70	5,052.50	1,075.00	4.70	3,515.60	748.00 80100		9689380	Billed
11/16/2023 Discuss p		1904 for hearing	LINDSAY C. HARRISON with Bill and Huiyi.	01	Partner	1	0.40	660.00	1,650.00	0.40	476.00	1,190.00 80100		9689380	Billed
11/16/2023 Call with J		1904 g, H. Chen	LINDSAY C. HARRISON re legal research in preparation for evidentiary he	01 earing.	Partner	1	0.50	825.00	1,650.00	0.50	595.00	1,190.00 80100		9689380	Billed
11/16/2023 Research		3406 -client privil	JOSHUA J.W. ARMSTRONG ege implications of potential testimony by plaintif	02 f and his attori	Associate ney re fabricated letter.	1	0.60	480.00	800.00	0.60	323.40	539.00 80100		9689380	Billed
11/16/2023	L120	3406	JOSHUA J.W. ARMSTRONG	02	Associate	1	0.70	560.00	800.00	0.70	377.30	539.00 80100		9689380	Billed

Time Report

Date	SM/Task	Attorney	Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate Service	Activity	Invoice	Status
Conferred	with L. Hai	rison and H	I. Chen re research on privilege and conflicts iss	ues.											
11/17/2023 Began dra		3406 re attorney	JOSHUA J.W. ARMSTRONG r-client privilege implications of potential testimon	02 าy by plaintiff a	Associate and his attorney re fabricated letter.	1	1.40	1,120.00	800.00	1.40	754.60	539.00 80100		9689380	Billed
11/17/2023 Research		3406 -client privile	JOSHUA J.W. ARMSTRONG ege implications of potential testimony by plaintif	02 f and his attor	Associate ney re fabricated letter.	1	2.80	2,240.00	800.00	2.80	1,509.20	539.00 80100		9689380	Billed
11/18/2023 Reviewed		2947 osition trans	HUIYI CHEN cripts in preparation for witness examination.	02	Associate	1	2.10	2,257.50	1,075.00	2.10	1,570.80	748.00 80100		9689380	Billed
11/20/2023 Attended	L120 call with clie	2947 ent.	HUIYI CHEN	02	Associate	1	0.20	215.00	1,075.00	0.20	149.60	748.00 80100		9689380	Billed
11/20/2023 Drafted pr		2947 for evidentia	HUIYI CHEN ary hearing.	02	Associate	1	4.80	5,160.00	1,075.00	4.80	3,590.40	748.00 80100		9689380	Billed
11/20/2023 Drafted m		3406 ential attorn	JOSHUA J.W. ARMSTRONG ey-client privilege issues at December 12, 2023	02 evidentiary he	Associate aring.	1	4.30	3,440.00	800.00	4.30	2,317.70	539.00 80100		9689380	Billed
11/20/2023 Strategize		3406 aming of "fr	JOSHUA J.W. ARMSTRONG aud" theory for piercing attorney-client privilege a	02 at evidentiary	Associate hearing.	1	1.30	1,040.00	800.00	1.30	700.70	539.00 80100		9689380	Billed
11/20/2023 Research		3406 for conflicts	JOSHUA J.W. ARMSTRONG sof interest to arise between plaintiff and his cou	02 insel at evider	Associate ntiary hearing.	1	1.00	800.00	800.00	1.00	539.00	539.00 80100		9689380	Billed
11/20/2023 Call with		1904 witnesses	LINDSAY C. HARRISON at evidentiary hearing.	01	Partner	1	0.20	330.00	1,650.00	0.20	238.00	1,190.00 80100		9689380	Billed
11/21/2023 Drafted m		3406 ential for co	JOSHUA J.W. ARMSTRONG nflicts of interest to arise between plaintiff and hi	02 s counsel at e	Associate videntiary hearing.	1	1.10	880.00	800.00	1.10	592.90	539.00 80100		9689380	Billed
11/21/2023 Prepared		1904 s with witne	LINDSAY C. HARRISON asses to conduct preparation for evidentiary hear	01 ing.	Partner	1	1.00	1,650.00	1,650.00	1.00	1,190.00	1,190.00 80100		9689380	Billed
11/22/2023 Reviewed		2947 ced research	HUIYI CHEN n memorandum regarding privilege issues in pre	02 paration for th	Associate evidentiary hearing.	1	0.80	860.00	1,075.00	0.80	598.40	748.00 80100		9689380	Billed
11/22/2023 Drafted m		3406 ential for co	JOSHUA J.W. ARMSTRONG  inflicts of interest to arise between plaintiff and hi	02 s counsel at e	Associate videntiary hearing.	1	0.60	480.00	800.00	0.60	323.40	539.00 80100		9689380	Billed
11/23/2023 Drafted di		2947 ock cross ex	HUIYI CHEN camination outlines for B. Maine.	02	Associate	1	4.50	4,837.50	1,075.00	4.50	3,366.00	748.00 80100		9689380	Billed
11/24/2023 Revised v		2947 mination out	HUIYI CHEN lines for B. Maine.	02	Associate	1	3.50	3,762.50	1,075.00	3.50	2,618.00	748.00 80100		9689380	Billed
11/24/2023 Drafted w		2947 nination outl	HUIYI CHEN ines for W. Herrmann.	02	Associate	1	1.00	1,075.00	1,075.00	1.00	748.00	748.00 80100		9689380	Billed
11/26/2023 Revised h		2947 outlines for	HUIYI CHEN r B. Maine and W. Herrmann.	02	Associate	1	5.30	5,697.50	1,075.00	5.30	3,964.40	748.00 80100		9689380	Billed
11/27/2023	L120	2947	HUIYI CHEN	02	Associate	1	1.10	1,182.50	1,075.00	1.10	822.80	748.00 80100		9689380	Billed

Time Report

Date	SM/Task	Attorney	Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate Service	Activity	Invoice	Status
Continued	I to revise h	earing prep	outlines for Amtrak witnesses.												
11/27/2023 Prepared f		1904 s with witne	LINDSAY C. HARRISON sses and reviewed legal research regarding cor	01 oflicts of interes	Partner st and privilege waiver in advance of	1 evidentia	2.20 ary hearing.	3,630.00	1,650.00	2.20	2,618.00	1,190.00 80100		9689380	Billed
11/28/2023 Drafted cro		2947 nation outline	HUIYI CHEN es for Bostian and Goggin.	02	Associate	1	0.80	860.00	1,075.00	0.80	598.40	748.00 80100		9689380	Billed
11/29/2023 Drafted cro		2947 nation outline	HUIYI CHEN es for Goggin and Bostian.	02	Associate	1	0.40	430.00	1,075.00	0.40	299.20	748.00 80100		9689380	Billed
11/29/2023 Conducted		3406 search re et	JOSHUA J.W. ARMSTRONG hical implications if plaintiff's counsel reveals clie	02 ent confidences	Associate s at evidentiary hearing.	1	0.50	400.00	800.00	0.50	269.50	539.00 80100		9689380	Billed
11/29/2023 Reviewed		1904 d draft direc	LINDSAY C. HARRISON tt estimony and witness prep.	01	Partner	1	1.70	2,805.00	1,650.00	1.70	2,023.00	1,190.00 80100		9689380	Billed
11/30/2023 Worked or		2947 sion with B. I	HUIYI CHEN Maine.	02	Associate	1	2.00	2,150.00	1,075.00	2.00	1,496.00	748.00 80100		9689380	Billed
11/30/2023 Continued		2947 oss examina	HUIYI CHEN ation outlines of Goggin and Bostian.	02	Associate	1	2.00	2,150.00	1,075.00	2.00	1,496.00	748.00 80100		9689380	Billed
11/30/2023 Researche		3406 mplications	JOSHUA J.W. ARMSTRONG of opposing counsel potentially revealing his clie	02 nt's confidentia	Associate al information at evidentiary hearing.	1	0.60	480.00	800.00	0.60	323.40	539.00 80100		9689380	Billed
11/30/2023 Researche		3406 I to disqualif	JOSHUA J.W. ARMSTRONG y opposing counsel based on possible testimony	02 y at evidentiary	Associate hearing.	1	1.00	800.00	800.00	1.00	539.00	539.00 80100		9689380	Billed
11/30/2023 Analyzed լ		3406 file motion	JOSHUA J.W. ARMSTRONG to disqualify opposing counsel based on ethical	02 violations and	Associate potential to be called as witness at tri	1 al.	1.10	880.00	800.00	1.10	592.90	539.00 80100		9689380	Billed
11/30/2023 Prepared f		1904 ticipated in <sub>l</sub>	LINDSAY C. HARRISON preparation meeting with B. Maine in advance of	01 evidentiary he	Partner earing.	1	2.20	3,630.00	1,650.00	2.20	2,618.00	1,190.00 80100		9689380	Billed
12/01/2023 Worked in		1904 n for eviden	LINDSAY C. HARRISON tiary hearing.	01	Partner	1	1.50	2,475.00	1,650.00	1.50	1,785.00	1,190.00 80100		0	Unbilled
12/03/2023 Revised B		2947 irect examir	HUIYI CHEN nation outline.	02	Associate	1	3.00	3,225.00	1,075.00	3.00	2,244.00	748.00 80100		0	Unbilled
12/03/2023 Drafted cro		2947 nation outline	HUIYI CHEN e for B. Bostian.	02	Associate	1	3.20	3,440.00	1,075.00	3.20	2,393.60	748.00 80100		0	Unbilled
12/04/2023 Revised di		2947 e for B. Mair	HUIYI CHEN ne and cross outline for B. Bostian.	02	Associate	1	3.00	3,225.00	1,075.00	3.00	2,244.00	748.00 80100		0	Unbilled
12/04/2023 Drafted cro		2947 for R. Gogg	HUIYI CHEN jin.	02	Associate	1	3.00	3,225.00	1,075.00	3.00	2,244.00	748.00 80100		0	Unbilled
12/04/2023 Prepared f		2947 prep sessio	HUIYI CHEN n with W. Herrmann.	02	Associate	1	2.10	2,257.50	1,075.00	2.10	1,570.80	748.00 80100		0	Unbilled
12/04/2023	L120	1904	LINDSAY C. HARRISON	01	Partner	1	2.00	3,300.00	1,650.00	2.00	2,380.00	1,190.00 80100		0	Unbilled

**Time Report** Billed and Unbilled 01/10/2024

Date	SM/Tasl	Attorney	Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate Service	Activity Invoice	Status
Worked or	n preparati	on for evide	ntiary hearing by reviewing record in state court	FELA case to	assess overlap arguments.									
12/04/2023 Call with F		1904 orepare for	LINDSAY C. HARRISON evidentiary hearing.	01	Partner	1	0.20	330.00	1,650.00	0.20	238.00	1,190.00 80100	0	Unbilled
12/05/2023 Attended		2947 p session w	HUIYI CHEN vith W. Herrmann.	02	Associate	1	1.00	1,075.00	1,075.00	1.00	748.00	748.00 80100	0	Unbilled
12/05/2023 Drafted or		2947 nt outline.	HUIYI CHEN	02	Associate	1	2.30	2,472.50	1,075.00	2.30	1,720.40	748.00 80100	0	Unbilled
12/05/2023 Conferred		3406 en re resea	JOSHUA J.W. ARMSTRONG rch on dismissal with prejudice and professional	02 responsibility	Associate issues.	1	0.30	240.00	800.00	0.30	161.70	539.00 80100	0	Unbilled
12/05/2023 Analyzed		3406 disqualify o	JOSHUA J.W. ARMSTRONG opposing counsel in related FELA case.	02	Associate	1	1.20	960.00	800.00	1.20	646.80	539.00 80100	0	Unbilled
12/05/2023 Research		3406 I for case to	JOSHUA J.W. ARMSTRONG be dismissed with prejudice if only opposing co	02 unsel (not plai	Associate ntiff himself) committed sand	1 ctionable conduct.	2.10	1,680.00	800.00	2.10	1,131.90	539.00 80100	0	Unbilled
12/05/2023 Met with T		1904 d H. Chen t	LINDSAY C. HARRISON o prepare for hearing.	01	Partner	1	1.00	1,650.00	1,650.00	1.00	1,190.00	1,190.00 80100	0	Unbilled
12/05/2023 Prepared		1904 ary hearing	LINDSAY C. HARRISON by working on examination outlines, talking poir	01 nts, and review	Partner ing key pleadings.	1	3.30	5,445.00	1,650.00	3.30	3,927.00	1,190.00 80100	0	Unbilled
12/06/2023 Revised c		2947 nation outlir	HUIYI CHEN ne for R. Goggin.	02	Associate	1	4.20	4,515.00	1,075.00	4.20	3,141.60	748.00 80100	0	Unbilled
12/06/2023 Drafted or		2947 at outline.	HUIYI CHEN	02	Associate	1	3.00	3,225.00	1,075.00	3.00	2,244.00	748.00 80100	0	Unbilled
12/06/2023 Research		3406 I to have ca	JOSHUA J.W. ARMSTRONG se dismissed with prejudice based on opposing	02 counsel's misc	Associate conduct.	1	2.20	1,760.00	800.00	2.20	1,185.80	539.00 80100	0	Unbilled
12/06/2023 Summariz		3406 h on dismis	JOSHUA J.W. ARMSTRONG sal with prejudice for H. Chen and L. Harrison.	02	Associate	1	0.30	240.00	800.00	0.30	161.70	539.00 80100	0	Unbilled
12/07/2023 Revised e		2947 outlines in	HUIYI CHEN preparation for evidentiary hearing.	02	Associate	1	1.40	1,505.00	1,075.00	1.40	1,047.20	748.00 80100	0	Unbilled
12/07/2023 Prepared		1904 nination and	LINDSAY C. HARRISON revised directs in preparation for evidentiary he	01 aring.	Partner	1	1.00	1,650.00	1,650.00	1.00	1,190.00	1,190.00 80100	0	Unbilled
12/08/2023 Prepared		2947 sted prep se	HUIYI CHEN ssion with B. Maine.	02	Associate	1	2.00	2,150.00	1,075.00	2.00	1,496.00	748.00 80100	0	Unbilled
12/08/2023 Drafted ar		2947 oral argume	HUIYI CHEN nt talking points.	02	Associate	1	7.00	7,525.00	1,075.00	2.00	1,496.00	748.00 80100	0	Unbilled
12/08/2023 Prepared		3406 evidentiary	JOSHUA J.W. ARMSTRONG hearing.	02	Associate	1	1.20	960.00	800.00	1.20	646.80	539.00 80100	0	Unbilled
12/08/2023	L120	3406	JOSHUA J.W. ARMSTRONG	02	Associate	1	2.90	2,320.00	800.00	1.50	808.50	539.00 80100	0	Unbilled

#### **Time Report** Billed and Unbilled NATIONAL RAILROAD PASSENGER CORPORATION / BOSTIAN V. AMTRAK (INDEMNIFICATION) (29030-10007)

**Rev Amt** SM/Task Attorney Name Staff Level Description Rate Orig Hrs Orig Amt Orig Rate Rev Hrs Rev Rate Service Activity Invoice Status Drafted talking points re attorney-client privilege waiver/exceptions for evidentiary hearing. 12/08/2023 L120 1904 LINDSAY C. HARRISON Partner 1.00 1.650.00 1,650.00 1.00 1,190.00 1,190.00 80100 0 Unbilled Met with B. Maine to prepare for her testimony at evidentiary hearing. 12/08/2023 L120 1904 LINDSAY C. HARRISON 01 Partner 1.50 2,475.00 1,650.00 1.50 1,785.00 1,190.00 80100 0 Unbilled Reviewed legal research on remedy for attorney misconduct. 12/09/2023 L120 1904 LINDSAY C. HARRISON 01 Partner 2.50 4,125.00 1,650.00 2.50 2,975.00 1,190.00 80100 0 Unbilled Prepared for evidentiary hearing. 12/10/2023 L120 2947 **HUIYI CHEN** 02 7,202.50 1,075.00 3.70 2,767.60 748.00 80100 0 Unbilled Associate 6.70 Revised and finalized witness examination and oral argument outlines. 12/11/2023 L120 2947 HUIYI CHEN 02 Associate 3.50 3,762.50 1,075.00 0.00 0.00 0.00 80100 0 Unbilled Prepared for oral argument and witness examinations at the upcoming evidentiary hearing. 12/11/2023 L120 1904 LINDSAY C. HARRISON 3.30 5,445.00 1,650.00 3.30 3,927.00 1,190.00 80100 0 Unbilled Partner Prepared legal argument and cross-examination of Goggin in preparation for evidentiary hearing. 12/11/2023 L120 1904 LINDSAY C. HARRISON Partner 0.30 495.00 1,650.00 0.30 357.00 1,190.00 80100 0 Unbilled Call with B. Herrmann to prepare for evidentiary hearing. 12/12/2023 L120 2947 **HUIYI CHEN** 02 8.00 8.600.00 1.075.00 0.00 0.00 0.00 80100 0 Unbilled Associate Prepared for and attended evidentiary hearing. 12/12/2023 L120 2947 HUIYI CHEN 02 2,902.50 1,075.00 2.70 2,019.60 748.00 80100 0 Unbilled Associate 2.70 Worked on hearing summary and follow-up filings. 12/12/2023 L120 3406 JOSHUA J.W. ARMSTRONG 02 Associate 1.60 1,280.00 800.00 0.00 0.00 0.00 80100 0 Unbilled Traveled to Philadelphia for evidentiary hearing. 12/12/2023 L120 3406 JOSHUA J.W. ARMSTRONG 02 1,200.00 539.00 80100 Associate 1.50 800.00 1.50 808.50 0 Unbilled Prepared for evidentiary hearing. 02 2.00 1,600.00 2.00 1,078.00 539.00 80100 0 12/12/2023 L120 3406 JOSHUA J.W. ARMSTRONG Associate 1 800.00 Unbilled Assisted at evidentiary hearing. JESSICA RING AMUNSON 01 0.00 0.00 80100 12/12/2023 L120 1898 Partner 0.30 408.00 1.360.00 0.00 0 Unbilled Communications re evidentiary hearing and disqualification. 12/12/2023 L120 LINDSAY C. HARRISON Partner 1 6.30 10,395.00 1,650.00 6.30 7,497.00 1,190.00 80100 0 Unbilled Prepared for and participated in hearing in E.D. Pa. on Bostian's motion to dismiss without prejudice. 12/12/2023 L120 LINDSAY C. HARRISON Partner 1.50 2,475.00 1,650.00 1.50 1,785.00 1,190.00 80100 0 Unbilled Reviewed and analyzed court order following hearing and discussed same with Amtrak and co-counsel. 12/12/2023 L120 1904 LINDSAY C. HARRISON Partner 1 1.00 1,650.00 1,650.00 0.00 0.00 0.00 80100 0 Unbilled Unproductive travel time. 12/14/2023 L120 2947 **HUIYI CHEN** 02 Associate 4.00 4.300.00 1.075.00 2.00 1.496.00 748.00 80100 0 Unbilled Drafted motion for the Court to retain jurisdiction. 12/14/2023 L120 3406 JOSHUA J.W. ARMSTRONG 02 Associate 0.30 240.00 800.00 0.30 161.70 539.00 80100 0 Unbilled

Time Report

Date	SM/Task	Attorney	Name	Staff Level	Description	Rate	Orig Hrs	Orig Amt	Orig Rate	Rev Hrs	Rev Amt	Rev Rate Service	Activity Invoice	Status
Conferred	with H. Che	en re draftir	ng and strategy for response to plaintiff's moti	on to dismiss with	n prejudice and motior	for attorney fees.								
12/14/2023 Drafted re		3406 laintiff's mo	JOSHUA J.W. ARMSTRONG otion to dismiss with prejudice.	02	Associate	1	0.50	400.00	800.00	0.50	269.50	539.00 80100	0	Unbilled
12/15/2023 Implemen		3406 sel's edits	JOSHUA J.W. ARMSTRONG to motion for court to retain jurisdiction.	02	Associate	1	0.20	160.00	800.00	0.20	107.80	539.00 80100	0	Unbilled
12/15/2023 Correspor		1904 edited, an	LINDSAY C. HARRISON d reviewed edits by others to draft motion for	01 federal court to re	Partner etain jurisdiction over f	1 ees and consent to dis	2.40 missal with pr	3,960.00 ejudice by Bostian	1,650.00 i.	2.40	2,856.00	1,190.00 80100	0	Unbilled
12/18/2023 Correspor		1904 B team to	LINDSAY C. HARRISON provide guidance about fee petition, schedule	01 , and backup for	Partner petition.	1	0.50	825.00	1,650.00	0.50	595.00	1,190.00 80100	0	Unbilled
12/18/2023 Began dra		3406 for attorne	JOSHUA J.W. ARMSTRONG eys' fees and costs.	02	Associate	1	4.50	3,600.00	800.00	4.50	2,425.50	539.00 80100	0	Unbilled
12/19/2023 Drafted ar		2947 otion to exte	HUIYI CHEN end time to file fee motion.	02	Associate	1	2.50	2,687.50	1,075.00	0.50	374.00	748.00 80100	0	Unbilled
12/19/2023 Reviewed		2947 ed hearing	HUIYI CHEN transcript to determine potential redaction.	02	Associate	1	1.50	1,612.50	1,075.00	1.50	1,122.00	748.00 80100	0	Unbilled
12/19/2023 Reviewed		1904 I motion fo	LINDSAY C. HARRISON radditional time to file fee petition.	01	Partner	1	0.20	330.00	1,650.00	0.20	238.00	1,190.00 80100	0	Unbilled
12/19/2023 Continued		3406 otion for att	JOSHUA J.W. ARMSTRONG orneys' fees and costs.	02	Associate	1	3.80	3,040.00	800.00	3.80	2,048.20	539.00 80100	0	Unbilled
12/20/2023 Coordinate		3406 of fees/cos	JOSHUA J.W. ARMSTRONG sts motion with H. Chen.	02	Associate	1	0.20	160.00	800.00	0.20	107.80	539.00 80100	0	Unbilled
12/20/2023 Continued		3406 otion for att	JOSHUA J.W. ARMSTRONG orneys' fees and costs.	02	Associate	1	1.80	1,440.00	800.00	1.80	970.20	539.00 80100	0	Unbilled
12/26/2023 Reviewed	L120 draft motion	2947 n for attorn	HUIYI CHEN eys' fees.	02	Associate	1	0.70	752.50	1,075.00	0.70	523.60	748.00 80100	0	Unbilled
12/26/2023 Continued		3406 otion for att	JOSHUA J.W. ARMSTRONG orneys' fees.	02	Associate	1	1.30	1,040.00	800.00	1.30	700.70	539.00 80100	0	Unbilled
12/28/2023 Revised d	L120 raft motion f	2947 or attorney	HUIYI CHEN vs' fees.	02	Associate	1	5.60	6,020.00	1,075.00	5.60	4,188.80	748.00 80100	0	Unbilled
12/29/2023 Edited mo	L120 tion for attor	3406 rneys' fees	JOSHUA J.W. ARMSTRONG	02	Associate	1	1.30	1,040.00	800.00	1.30	700.70	539.00 80100	0	Unbilled
Report Tota	.la.						435.60	492,175.00		406.40	322,867.80			

Attorney	Name	Description	Orig Hrs	Orig Amt	Orig   Rate	Rev Hrs	Rev Amt	Rev Rate	First	Last
1898	JESSICA RING AMUNSON	Partner	1.00	1,360.00 1	,360.00	0.70	719.60	1,028.00	07/24/2023	12/12/2023
1904	LINDSAY C. HARRISON	Partner	63.70	105,105.00 1	,650.00	62.70	74,613.00	1,190.00	06/14/2023	12/19/2023
2947	HUIYI CHEN	Associate	323.60	347,870.00 1	,075.00	299.80	224,250.40	748.00	06/20/2023	12/28/2023
3406	JOSHUA J.W. ARMSTRONG	Associate	47.30	37,840.00	800.00	43.20	23,284.80	539.00	11/15/2023	12/29/2023
Report To	tals:		435.60	492,175.00		406.40	322,867.80			

## EXHIBIT 2

Cost Report Billed and Unbilled

NATIONAL RAILROAD PASSENGER CORPORATION / BOSTIAN V. AMTRAK (INDEMNIFICATION) (29030-10007)

<sup>\*</sup> Values are displayed in US Dollars, \$

Date SM/Tas	k Service Code	Description	Attorney	Orig Qty	Orig Amt	Rev Qty	Rev Amt Vendor	Voucher	Check No.	Check Date	Check Status	Invoice	Status
07/31/2023 E106 Westlaw Research	00018	Westlaw Research	9901	0.00	178.74	0.00	0.00	0				9681346	Billed
08/31/2023 E106 Westlaw Research	00018	Westlaw Research	9901	0.00	42.30	0.00	0.00	0				9683400	Billed
09/01/2023 E101 B&W Copy	00108	B&W Copy	9901	0.00	10.89	99.00	0.00	0				9685407	Billed
09/30/2023 E106 Westlaw Research	00018	Westlaw Research	9901	0.00	347.81	0.00	0.00	0				9685407	Billed
10/04/2023 E106	00103	Pacer Charges	COST	0.00	32.40	0.00	0.00 PACER SERVICE CENTER	1520601	999033360	11/28/2023		9690537	Billed
Pacer; 2567225-Q32	2023; 10/04/2023												
10/31/2023 E106 Westlaw Research	00018	Westlaw Research	9901	0.00	120.18	0.00	0.00	0				9687301	Billed
11/16/2023 E101 B&W Copy	00108	B&W Copy	9901	0.00	23.54	214.00	0.00	0				9689380	Billed
11/17/2023 E101 B&W Copy	00108	B&W Copy	9901	0.00	14.19	129.00	0.00	0				9689380	Billed
11/29/2023 E110 Travel, LINDSAY HA	00096 RRISON, 11/29/20	Travel 23	9999	0.00	295.74	0.00	295.74 LINDSAY HARRISON	1524173	213851	01/09/2024		0	Unbilled
11/30/2023 E101 B&W Copy	00108	B&W Copy	9901	0.00	15.84	144.00	0.00	0				9689380	Billed
11/30/2023 E106 Westlaw Research	00018	Westlaw Research	9902	0.00	480.39	0.00	0.00	0				9689380	Billed
11/30/2023 E106 Westlaw Research	00018	Westlaw Research	9902	0.00	480.39	0.00	0.00	0				9689380	Billed
12/05/2023 E110 Travel, JOSHUA AR	00096 MSTRONG, 12/05/	Travel 2023	9999	0.00	414.00	0.00	414.00 JOSHUA ARMSTRONG	1521893	213239	12/14/2023		0	Unbilled
12/08/2023 E101 Color Copy	00100	Color Copy	9901	0.00	64.50	258.00	0.00	0				0	Unbilled
12/08/2023 E101 B&W Copy	00108	B&W Copy	9901	0.00	14.74	134.00	0.00	0				0	Unbilled
12/08/2023 E101 B&W Copy	00108	B&W Copy	9902	0.00	19.47	177.00	0.00	0				0	Unbilled
12/10/2023 E101 Color Copy	00100	Color Copy	9901	0.00	102.75	411.00	0.00	0				0	Unbilled
12/10/2023 E101	00108	B&W Copy	9901	0.00	11.11	101.00	0.00	0				0	Unbilled

Date SM/Task Service Code Description Attorney Orig Qty Orig Amt Rev Qty Rev Amt Vendor Voucher Check No. Check Date Check Status Invoice Status **B&W Copy** 12/11/2023 E110 880.10 HUIYI CHEN 213463 12/21/2023 0 Unbilled 00096 Travel 9999 0.00 880.10 0.00 1522782 Travel, HUIYI CHEN, 12/11/2023 12/15/2023 E112 00058 101.40 ELAN CORPORATE 0 Court Fees 9999 0.00 101.40 0.00 1522909 99999999 12/21/2023 Unbilled PAYMENT SYSTEMS Court Fees, ELAN CORPORATE PAYMENT SYSTEMS, 12/15/ 2023 12/31/2023 E106 Westlaw Research 9901 0.00 370.34 0.00 0.00 0 0 Unbilled Westlaw Research 12/31/2023 E106 00018 Westlaw Research 9902 0.00 1,496.46 0.00 0.00 0 0 Unbilled Westlaw Research

5,517.28 1,667.00

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Report Totals:

## EXHIBIT 3



44 Valley Forge Road Bordentown, NJ 08505 (973) 985-3668 TAX ID NO. 85-2034988 December 14, 2023

Jenner & Block, LLP Lindsay C. Harrison 353 N. Clark Street Chicago, Illinois 60654 Invoice 1140

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IN RE: Bostian vs. National Railroad Passenger Corp. (Amtrak) 2:23-cv-01975-JFM

**Invoicing Information** 

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Transcript 12-12-23 78 pages @ \$1.30 p.p. \$ 101.40

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I CERTIFY THAT THE TRANSCRIPT FEES CHARGED AND PAGE FORMAT USED COMPLY WITH THE REQUIREMENTS OF THIS COURT AND THE JUDICIAL CONFERENCE OF THE UNITED STATES

**PAID IN FULL** 

Cathere Kare